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October 19, 2023

Via ECF

The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Re: Go Global Retail, LLC v. Dream On Me, Inc.
Case No. 1:23-cv-07987-AS
GRSD File No. 31685-00003

Arun Subramanian, U.S.D.J.
Date: October 20, 2023

Dear Judge Subramanian:

This firm, along with Fox & Melofchik, LLC, represents Defendant, Dream On Me, Inc. ("DOM"). Plaintiff, Go Global Retail, LLC, filed a complaint on September 14, 2023. See ECF #5. The clerk of the court issued an Amended Summons on September 29, 2023. See ECF #11. On October 3, 2023, DOM was served with the complaint. See ECF # 12. The current deadline for DOM to answer or otherwise plead is on or before October 24, 2023.

Pursuant to Local Civil Rule 7.1(d), DOM respectfully requests additional time for counsel to review the pleadings and investigate the claims against DOM before filing a response to the complaint. Additionally, counsel anticipates filing a motion for pro hac vice admission of Judah Skof, Esq., of Greenbaum, Rowe, Smith & Davis, LLP, on or before the responsive pleading is due. Therefore, DOM respectfully requests that the deadline to answer or otherwise plead be extended 28 days to allow counsel adequate time to file the Motion in advance of a responsive pleading. With the Court's permission, along with the consent of our adversary, DOM shall file and serve an Answer, or otherwise plead, on or before November 21, 2023. This is DOM's first request for an extension of time.

Currently scheduled before Your Honor is an Initial Pretrial Conference on November 30, 2023, at 10:30 a.m., in Courtroom 15A. The extension will not affect any dates or deadlines scheduled.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,


GREENBAUM, ROWE, SMITH & DAVIS, LLP

Jessica M. Carroll

Gary E. Fox, Esq.

FOX & MELOFCHIK, LLC

Co-counsel for Defendant, Dream On Me, Inc.

cc: All Counsel of Record (via ECF)

So Ordered:

Arun Subramanian
United States District Court